

Seventh Affirmative Defense

The Complaint is barred by the doctrine of unclean hands; the aforementioned Fourth and Sixth Affirmative Defenses expound the Complainant's fiscal negligence and recklessness.

PRAYER FOR RELIEF

WHEREFORE, Defendant, Bowe and Bowe, CPA requests that this Honorable Court:

1. Dismiss the Complaint.
2. Enter judgement for the Defendant, Bowe and Bowe, CPA on all counts.
3. Award Bowe and Bowe, CPA the costs of defending this action, as well as such other additional relief as the Court may determine to be just and proper.
4. Award attorney's fees and costs relative to M.G.L. ch. 93A.

Dated: March 8th 2021

Respectfully Submitted,

/s/Thomas M. Barron
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